

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,

Plaintiff,

vs.

Diamondback Shooting Sports, Inc., an Arizona corporation; SNG Tactical, LLC, an Arizona limited liability company; Loan Prairie, LLC D/B/A The Hub, an Arizona limited liability company; Ammo A-Z, LLC, an Arizona limited liability company; Sprague's Sports, Inc., an Arizona corporation,

Defendants.

Case No: 4:22-cv-00472-TUC-RM

**STIPULATION TO CONTINUE
DEADLINE FOR ESI PROTOCOL
SUBMISSION**

(First Request)

The Plaintiff, Estados Unidos Mexicanos, and Defendants, Diamondback Shooting Sports, Inc.; SNG Tactical, LLC; Loan Prairie, LLC d/b/a The Hub; Ammo A-Z, LLC; and Sprague's Sports, Inc. ("Defendants"), by and through their undersigned counsel, hereby agree and stipulate to continue the deadline for the parties to submit the proposed protocol governing the disclosure of electronically stored information ("ESI"), as required in the Court's Order dated March 11, 2024 (ECF No. 49).

The parties have exchanged and reviewed a comprehensive ESI protocol. However, to address the feasibility and implementation of the provisions of any such protocol, further investigation is required by defendants' counsel as to the manner and form in which information is maintained by their clients and whether an ESI vendor is necessary for

purposes of compliance with the proposed protocol for both plaintiff's and defendants' productions.

The parties anticipate being able to submit a proposed ESI protocol to the Court for consideration on or before **Monday, May 17, 2024**.

Dated: April 15, 2024

Respectfully submitted,

<p>Plaintiff Estados Unidos Mexicanos By its attorneys,</p> <p><u>/s/ Ryan O'Neal (w/ permission)</u> Ryan O'Neal (AZ # 031919) roneal@dmyl.com DECONCINI MCDONALD YETWIN & LACY, P.C. 2525 East Broadway Blvd., Suite 200 Tucson, AZ 85716-5300 (520) 322-5000</p> <p>and</p> <p>Steve Shadowen steve@hillardshadowenlaw.com Tina J. Miranda tmiranda@hillardshadowenlaw.com Nick Shadowen nshadowen@hillardshadowenlaw.com SHADOWEN PLLC 1135 W. 6th Street, Suite 125 Austin, TX 78703 (855) 344-3298</p> <p>and</p> <p>Jonathan E. Lowy Global Action on Gun Violence 1025 Connecticut Avenue NW #1210 Washington, DC 20036 jlowy@actiononguns.org (202) 415-0691</p>	<p>Defendants, Diamondback Shooting Sports, Inc., Loan Prairie, LLC d/b/a The Hub, SNG Tactical, LLC, and Sprague's Sports, Inc., By their attorneys,</p> <p><u>/s/ Jeffrey Malsch</u> Christopher Renzulli crenzulli@renzullilaw.com Peter Malfa pmalfa@renzullilaw.com Jeffrey Malsch jmalsch@renzullilaw.com RENZULLI LAW FIRM LLP One North Broadway, Suite 1005 White Plains, NY 10601 (914) 285-0700</p> <p>and</p> <p>Louis W. Horowitz LORBER, GREENFIELD & OLSEN, LLP 3930 E. Ray Road, Suite 260 Phoenix, AZ 85044 (602) 385-2677</p>
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Defendant,
Ammo A-Z, LLC,
By its attorneys,

/s/ Ryan Erdreich (w/ permission)

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CERTIFICATE OF SERVICE

I, Jeffrey Malsch, attorney for the certain defendants, hereby certify that on the 15th day of April, 2024, a true copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served by first-class mail, postage prepaid, upon anyone indicated as a non-registered participant.

/s/ Jeffrey Malsch
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